

Exhibit 54

STATE OF TEXAS, ET AL. vs. UNITED STATES OF AMERICA, ET AL.
Esther Jeon on 06/15/2018

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF TEXAS
3 BROWNSVILLE DIVISION
4
5 STATE OF TEXAS, et al.,)
6 Plaintiffs,)
7 vs) No. 1:18-CV-68
8 UNITED STATES OF AMERICA,)
9 et al.,)
10 Defendants.)
11 and)
12 KARLA PEREZ, et al.,)
13

14 The deposition of Esther Jeon called for
15 examination pursuant to notice and pursuant to the
16 Federal Rules of Civil Procedure for the United
17 States District Courts pertaining to the taking of
18 depositions taken before JO ANN LOSOYA, Certified
19 Shorthand Reporter within and for the County of Cook
20 and State of Illinois at 11 East Adams, Chicago,
21 Illinois, on June 15, 2018 at the hour of 11:00
22 o'clock a.m.
23
24
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1 APPEARANCES:

2 MALDEF
3 MS. PRISCILLA ORTA
4 MS. GRISELDA VEGA SAMUEL
5 11 East Adams Street
6 Suite 700
7 Chicago, Illinois 60603
8 (312) 427-0701
9 porta@maldef.org
10 gvegasamuel@maldef.org
11 Appeared on behalf of the Deponent and
12 Intervenors;

13 ATTORNEY GENERAL OF THE STATE OF TEXAS
14 MR. ADAM N. BITTER
15 MS. CRISTINA M. MORENO
16 P.O. BOX 12548
17 Austin, Texas 78711
18 (512) 463-2120
19 adam.bittter@oag.texas.gov
20 cristina.moreno@oag.texas.gov
21 Appeared on behalf of the Plaintiffs.

22 U.S. DEPARTMENT OF JUSTICE
23 MR. JAMES WALKER
24 Ben Franklin Station
25 P.O. Box 868
Washington, DC 20044
(202) 532-4468
james.walker3@usdoj.gov
Appeared on behalf of the Defendant.

17 APPEARING TELEPHONICALLY:

18 ALEJANDRA AVILA, MALDEF
19 NINA PERALES, MALDEF
20 NICHOLAS DOLINSKY, New Jersey Attorney General
Office

21 ALSO PRESENT:

22 NAYOUNG HANA
23 SUSANA SANDOVAL VARGAS

24 REPORTED BY: JO ANN LOSOYA
CSR LICENSE: 084-002437
25

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1 Q. Do you recall at all when that would have
2 been when you moved back to Houston at that time?

3 A. I do not recall.

4 Q. Between your second stint in Houston and
5 then graduated from high school, did you live
6 anywhere else other than Houston?

7 A. No.

8 Q. All right. So, a couple of more
9 questions about this second Houston stint then.

10 I know you said you can't remember,
11 but can you recall whether when you went to Houston,
12 you would have been in high school by that point or
13 not?

14 A. I attended middle school and high school
15 in Houston.

16 Q. Thank you. That helps.

17 Do you recall what middle school it
18 was?

19 A. Yes.

20 Q. What school was it?

21 A. Spring Forest.

22 Q. Is that a public school?

23 A. Yes.

24 Q. Then you went to high school at that
25 point, right?

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1 A. Yes.

2 Q. What high school did you go to?

3 A. Stratford High School.

4 Q. Is that a public high school?

5 A. Yes.

6 Q. Do you know when you first attended

7 Stratford High School?

8 A. 2009.

9 Q. How long were you at Stratford for?

10 A. Four years.

11 Q. And you graduated in 2013?

12 A. Yes.

13 Q. Congratulations, first of all.

14 A. Thank you.

15 Q. That four-year span, just to clarify,

16 Stratford was the only high school you went to

17 during that time?

18 A. Yes.

19 Q. And you received DACA in 2012; is that

20 correct?

21 A. Yes.

22 Q. We'll talk a little more about that. I

23 just wanted to get the sequence in mind.

24 While -- I think you said this in

25 your declaration. While you were in high school,

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1 objection to immigration information or, in the
2 sense, we're hoping it will be marked as
3 confidential.

4 MR. BITTER: Understood.

5 BY MR. BITTER:

6 Q. If I could ask you about Page 3. Go to
7 Page 3. It talks about biometric services
8 appointment. We talked about this briefly. I want
9 to close the loop on that.

10 In terms of you providing
11 fingerprints and photographs, do you recall that
12 being pursuant to a notice that you received from
13 the federal government to appear for those
14 biometrics?

15 A. I appeared because I received a
16 biometrics appointment notice.

17 Q. Further down on the page, there's a
18 heading called advanced parole. Are you familiar
19 with the term "advanced parole"?

20 A. I am familiar with it.

21 Q. What is your understanding of advanced
22 parole?

23 MS. SAMUEL: Objection, calling for legal
24 conclusion. She's not a lawyer.

25

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1 BY MR. BITTER:

2 Q. You can answer, if you know.

3 A. I understand that as it pertains to me,
4 as a DACA recipient, I would have been allowed to
5 leave the United States.

6 Q. So your understanding is that advanced
7 parole is what allows you to travel outside the
8 United States; is that right?

9 A. As it pertains to me as a DACA recipient,
10 that is how I understand it.

11 Q. Have you applied for advanced parole?

12 A. No.

13 Q. Are you aware of others who have applied,
14 other DACA recipients who applied for advanced
15 parole?

16 A. Yes.

17 Q. Do you have any understanding about the
18 advanced parole process based on others that you
19 know who have applied for it?

20 A. No.

21 Q. You just know that others have applied
22 for advanced parole; is that fair?

23 A. Yes.

24 Q. Do you know anything about the process
25 beyond that?

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1 REPORTER CERTIFICATE

2

3 I, JO ANN LOSOYA, a Certified Shorthand
4 Reporter within and for the County of Cook and State
5 of Illinois, do hereby certify:

6 That previous to the commencement
7 of the examination of the witness, the witness was
8 duly sworn to testify the whole truth concerning the
9 matters herein;

10 That the foregoing deposition
11 transcript was reported stenographically by me, was
12 thereafter reduced to typewriting under my personal
13 direction and constitutes a true record of the
14 testimony given and the proceedings had;

15 That the said deposition was taken
16 before me at the time and place specified;

17 That I am not a relative or
18 employee or attorney or counsel, nor a relative or
19 employee of such attorney or counsel for any of the
20 parties hereto, nor interested directly or
21 indirectly in the outcome of this action.

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1 IN WITNESS WHEREOF, I do hereunto set my
2 hand this June 27, 2018.
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JO ANN LOSOYA, CSR
C.S.R. No. 84-002437

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